

David Yeger

From: JOHN REICHMAN <john@johnreichmanlaw.com>
Sent: Tuesday, February 2, 2021 11:57 AM
To: David Yeger; Theodore Boutrous (TBoutrous@gibsondunn.com); Marissa Moshell (MMoshell@gibsondunn.com)
Subject: FW: La Liberte v Reid

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From: David Olasov <dolasov@olasov.com>
Sent: Tuesday, February 2, 2021 11:45 AM
To: JOHN REICHMAN <john@johnreichmanlaw.com>; David Olasov <dolasov@olasov.com>
Cc: Theodore Boutrous (TBoutrous@gibsondunn.com) <TBoutrous@gibsondunn.com>; Lin Wood <lwood@linwoodlaw.com>
Subject: RE: La Liberte v Reid

I am tied up today. I will make time to talk to you tomorrow.

To move matters forward, why don't you do a draft of a protective order that you are prepared to sign. One concern is that your client and its representatives will run amuck with our client's continuing business relationships. Hers is a tight community of franchisees and servicers. So messing with prior relationships of some standing is calculated to impact continuing ones. It doesn't take genius to appreciate that your client's labeling our client a racist doing racist things is highly likely to adversely affect her standing in a community of contractors and business people with a substantial population of Hispanic and other minorities.

I will call you after I review your draft.

Also, let me know if you have abandoned your position on calculation of per se damages in light of the applicable case authority. Fighting over the initial disclosures statement is not an efficient way to proceed.

David

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----- Original message -----

From: JOHN REICHMAN <john@johnreichmanlaw.com>
Date: 2/1/21 6:16 PM (GMT-05:00)
To: David Olosov <dolasov@olasov.com>
Cc: "Theodore Boutrous (TBoutrous@gibsondunn.com)" <TBoutrous@gibsondunn.com>
Subject: La Liberte v Reid

Hi David,

Thank you for the revised initial disclosures, but they are still inadequate. You were required to identify witnesses with knowledge, which includes the persons who allegedly stopped doing business with your client. You also needed to provide any documents connecting the losses to the defendant's posts

You also have not provided other relevant documents about the plaintiff's business, saying you needed to have a confidentiality order in place first. Putting aside whether this is a proper objection, we are prepared to agree to a confidentiality order forthwith. Please let me know if you available for a call tomorrow to discuss these matters. John

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